

SPEARS & IMES LLP

767 Third Avenue
New York, NY 10017
tel 212 213-6996
fax 212 213-0849

Reed M. Keefe
tel 212 897-4485
rkeefe@spearsimes.com

July 13, 2023

Application Granted.

BY ECF

The Honorable P. Kevin Castel
United States District Court
Southern District of New York
500 Pearl Street
New York, New York 10007

So Ordered:


Hon. P. Kevin Castel, U.S.D.J.

7-13-23

Re: *United States v. Andrew Brown*, S1 20 Cr. 470 (PKC)

Dear Judge Castel:

We respectfully write on behalf of Andrew Brown to request that the restrictions on his travel be modified to allow him to travel to the Northern District of New York on July 18, 2023. The Court has previously ruled that Mr. Brown may make requests to travel to the Northern District of New York on a case-by-case basis. (ECF No. 60.)

OK

We make this request because Mr. Brown's father is undergoing a medical procedure in Albany, New York on July 18. Mr. Brown would like to help his father travel from his father's home in Massachusetts¹ to Albany and back on that day. The Government and the Pretrial Services Officer supervising Mr. Brown have no objection to this request.

OK

Thank you for your consideration of this request.

Respectfully submitted,

/s Reed M. Keefe

Max Nicholas
Reed M. Keefe
Attorneys for Andrew Brown

cc: All Counsel via ECF

¹ Mr. Brown's bail conditions permit him to travel to the District of Massachusetts for family visits without making a prior request to the Court. (ECF No. 49.)